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Attorneys for Blockchain Game Partners, Inc.

d/b/a Gala Games and d/b/a BGP Games

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

ERIC SCHIERMEYER, Derivatively on Behalf
of Nominal Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,

Plaintiff,

vs.

WRIGHT W. THURSTON and TRUE NORTH
UNITED INVESTMENTS, LLC

Defendants.

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,

Nominal Defendant.

**BLOCKCHAIN GAME PARTNERS,
INC.'S RESPONSE TO DEFENDANTS'
MOTION FOR PRELIMINARY
INJUNCTION ORDERING THE
TEMPORARY APPOINTMENT OF A
CUSTODIAN [DKT. 88]**

Case No. 2:23-cv-00589-HCN-DAO

The Honorable Howard C. Nielson, Jr.

Magistrate Judge Daphne A. Oberg

TRUE NORTH UNITED INVESTMENTS,
LLC, Derivatively on Behalf of Nominal
Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,

Counterclaimant,

vs.

ERIC SCHIERMEYER,

Counterdefendant,

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,

Nominal Counterdefendant.

TRUE NORTH UNITED INVESTMENTS,
LLC,

Crossclaim Plaintiff,

vs.

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,

Crossclaim Defendant

This litigation concerns multiple disputes between Eric Schiermeyer (“Schiermeyer”) on one hand and Wright Thurston (“Thurston”) and his investment vehicle True North Investments, LLC (“True North”) on the other. Caught in the middle of this dispute is Blockchain Game Partners, Inc. (“BGP” or the “Company”), the company Schiermeyer and Thurston (through True North) founded. The Company is currently a party to the litigation by virtue of True North’s crossclaims against the Company directly. As this Court is aware, the Company argues the claims against it are required to be brought in arbitration (Dkt. 89).

True North’s latest motion for preliminary injunction seeks the appointment of a temporary custodian to act as President, CEO, and sole Director of the Company (Dkt. 88) (“Motion”). Technically, True North’s Motion is based on a claim asserted against Schiermeyer, not any claim asserted directly against the Company. However, there can be no doubt that the relief sought, if granted, will have a drastic impact on the Company, its shareholders, and its employees.

If this Court determines that Wyoming law permits appointment of a custodian to act as President, CEO, and/or sole Director in these circumstances, the Company requests that this Court give the parties, including the Company, a chance to subsequently brief in detail the industry experience and qualifications necessary to effectively serve in those position(s) and the appropriate limitations on authority and specific delegated duties of any custodian.

DATED this 2nd day of February, 2024

FOLEY & LARDNER LLP

/s/ Monia S. Call

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*Attorneys for Blockchain Game Partners, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2024, a true and correct copy of the foregoing **BLOCKCHAIN GAME PARTNERS, INC.’S RESPONSE TO DEFENDANTS’ MOTION FOR PRELIMINARY INJUNCTION ORDERING THE TEMPORARY APPOINTMENT OF A CUSTODIAN [DKT. 88]** was served through the court’s e-filing system which caused notice of filing to be sent to all counsel of record.

/s/ Rose Gledhill _____